

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UMG RECORDINGS, INC, CAPITOL
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED MUSIC
ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC,

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER
KAHLE, KAHLE/AUSTIN FOUNDATION,
GEORGE BLOOD, and GEORGE BLOOD,
L.P.,

Defendants.

Case No. 23-cv-7133-LGS-JW

**DECLARATION OF ANDREW M. GASS
IN SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

I, Andrew M. Gass, declare as follows:

1. I am a partner at the law firm of Latham & Watkins LLP, and I am counsel for Defendants Internet Archive, Brewster Kahle, George Blood, and George Blood L.P.
2. I respectfully submit this declaration in support of my Motion to Admit Counsel *Pro Hac Vice* in the above-captioned matter.
3. I have been a member in good standing of the Bar of the State of California since December 5, 2008.
4. I attach a Certificate of Good Standing from the State of California, which was issued within thirty days of this filing, as Exhibit A to my Motion to Admit Counsel *Pro Hac Vice*.
5. I have never been convicted of a felony or been the subject of any criminal conviction.
6. I have never been censured, suspended, disbarred, or denied admission or readmission by any federal or state court in the United States.

7. I have never been the subject of a disciplinary sanction, and there are no disciplinary proceedings presently pending against me.

Wherefore your declarant respectfully submits that he be permitted to appear as counsel *pro hac vice* in this one case on behalf of Defendants Internet Archive, Brewster Kahle, George Blood, and George Blood L.P.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 8, 2023

/s/ Andrew M. Gass
Andrew M. Gass